



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III
CENTRAL REGIONAL LABORATORY
839 BESTGATE ROAD
ANNAPOLIS, MARYLAND 21401

301-224-2740
FTS-922-3752

140686

DATE : November 18, 1985

SUBJECT: Review of Wright Lab Services, Inc. QAPP for Palmerton Zinc
(6TGB03R626 NPL)

FROM : Patricia J. Krantz (3ES20) PK
DPO QA

TO : Carol Stokes (3HW12)
CERCLA Remedial Enforcement Section

Per your request, I have reviewed the subject document and have the following observations, comments and/or questions:

1. As submitted, the document does not meet our requirements for a site specific QAPP. As a "generic" statement of corporate policy, it is adequate, but it does not contain the specific information needed to evaluate Wright Lab's capabilities at NJ Zinc-Palmerton. They should be referred to QAMS guidance "Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans", QAMS-005/80. If they do not have a copy, I can provide one or you could get one from Charles Jones, ESD, on the 8th floor.
2. On pages 7 and 8, I found the discussion about "quality needed" and "acceptance limits" very confusing. They seem to have data quality objectives (quantitative statements of user requirements) and quality control limits (indicators used to determine if objectives are met) confused. Labs need to know the objectives (ideally provided by the Program office) and in the Plan state whether and how these objectives will be met, measured and quantified.
3. On page 10, I believe they mean "separate" instead of "duplicate" in paragraph 2, line 7.
4. I still need to have our lab people verify the sample container cleaning procedures--presumably blanks have been used to verify these procedures.
5. On page 12 the term "large headspace" should be more specifically defined as it relates to the lab's sample acceptance policy.
6. The sampling plan (discussed on pages 12-13) should include how the number of samples to be collected is to be or has been determined and why this number is adequate to address study data quality objectives.

AR302255

7. How does the procedure on page 14 relate to ensuring compliance to required analytical holding times?
8. I do not understand their spiking procedure on page 21--what does spike into "blank samples of the matrix" mean?
9. Finally, as I mentioned on the phone, I believe some of the 16 critical elements are not addressed. Provision of the guidance mentioned in item 1 should resolve that when a site specific plan is prepared.

I will be back in the office on the 22nd. If you have any questions, give me a call.

AR302256